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February 12, 2020

VIA, ELECTRONIC FILING

Jo Anne Wessinger Hill, Esquire,
Hearing Officer,
The Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

- Re: • Ganymede Solar, LLC v. Dominion Energy South Carolina, Incorporated
 • Docket 2019-390-E
 • **Response to Correspondence**

Ms. Hill:

The undersigned is counsel of record for Ganymede Solar, LLC, (“Ganymede”). I am writing in response to today’s correspondence to you, from counsel for Dominion Energy South Carolina, Incorporated (“Utility”) relevant to filing dates.

The Utility’s correspondence asks for an **indefinite** extension of five days from the later of (i) February 19, 2020, (the Utility’s current Testimony filing deadline) or (ii) the date this Commission hears and decides the current discovery dispute¹.

Unfortunately, the Utility’s request to you did not include a concomitant request that subsequent deadlines for Ganymede also be indefinitely extended. Accordingly, I request on behalf of Ganymede, that all subsequent filing deadlines and the Hearing date be indefinitely extended, if you extend the Utility’s February 19, 2020 filing date, as requested in the Utility’s correspondence today.

¹ Because it is obvious that this Commission will not hear and decide the pending discovery dispute by February 19, 2020, the Utility is actually requesting an extension until five days after this Commission hears and decides the discovery dispute in the future.

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Also, because the Utility's correspondence, in its request for an indefinite extension, takes the liberty of negatively characterizing Ganymede's position, please consider the following. As usual, the Utility's correspondence fails to mention that Ganymede has not simply failed to provide adequate discovery responses, but instead Ganymede has filed, prior to the due date of the discovery responses, comprehensive objections and a Motion for Protective Order consistent with Rule 26(c), of the South Carolina Rules of Civil Procedure.

If you have any questions, please do not hesitate to contact me, and this correspondence is,

Respectfully Submitted,

/S/Richard L. Whitt
Richard L. Whitt,
As Counsel for Ganymede Solar, LLC

RLW/cas

cc: All parties of record in Docket 2019-390-E, *via electronic mail*